

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

Case No.

**22-CR-155**

[18 U.S.C. §§ 922(g)(1) and  
924(a)(2); 26 U.S.C. §§ 5861(d) and  
5871]

MITCHELL J. GUERRERO,

Defendant.

Green Bay Division

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**INDICTMENT**

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**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about November 15, 2021, in the State and Eastern District of Wisconsin,

**MITCHELL J. GUERRERO,**

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, more fully described as a Mossberg 20-gauge shotgun bearing serial number R373610, which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about November 15, 2021, in the State and Eastern District of Wisconsin,

**MITCHELL J. GUERRERO**

knowingly possessed firearms, as defined in Title 26, United States Code, Sections 5845(a), that were not registered to him in the National Firearms Registration and Transfer Record.

2. The firearms are more fully described as:

- a. a 3D printed .22 caliber firearm bearing the markings "WASHBEAR" and "PATRICK";
- b. a 3D printed firearm silencer, black in color, measuring approximately 5-3/8 inches in overall length; and
- c. a metal firearm silencer, grey in color, measuring approximately 6 inches in overall length.

All in violation of Title 26, United States Code, Sections 5861(d) and 5871.

**NOTICE OF FORFEITURE**

1. Upon conviction of the offense as set forth in Counts One and Two of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), Title 28, United States Code, Section 2461(c) and Section 5872, and Title 49, United States Code, Section 80302, any firearms and ammunition involved in the offense of conviction, including, but not limited to, a Mossberg 20-gauge shotgun bearing serial number R373610, a 3D printed .22 caliber firearm bearing the markings "WASHBEAR" and "PATRICK," a 3D printed firearm silencer, black in color, measuring approximately 5-3/8 inches in overall length, and a metal firearm silencer, grey in color, measuring approximately 6 inches in overall length.

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL: *A.J.*

FOREPERSON

Dated: *8-9-22*

*for* *RICHARD G. FROHLING*  
RICHARD G. FROHLING  
United States Attorney